IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA SPARTANBURG DIVISION

JANE DOES 1-9,

Civil Action Number: 7:20-cv-00947-TMC

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE COLLEGE, MG FREESITES, LTD d/b/a PORNHUB.COM, and HAMMY MEDIA, LTD. d/b/a XHAMSTER.COM,

STATEMENT AND CERTIFICATION

DEFENDANT MG FREESITES' ADR

Defendants.

Pursuant to Local Civil Rule 16.03 (D.S.C.), the undersigned certifies he (1) provided the party he represents [Defendant MG Freesites, LTD ("Defendant")] with any materials relating to ADR which were required to be provided by Local Civil Rule 16.01 or order of the Court; (2) discussed the availability of ADR mechanisms with the party; and (3) discussed the advisability and timing of ADR with opposing counsel. As required by the Court's November 9, 2020 Conference and Scheduling Order (ECF 62), as amended (ECF 78), Defendant states it agrees to mediation.

[signature page follows]

Respectfully submitted,

TURNER, PADGET, GRAHAM AND LANEY, P.A. DATED: December 15, 2020

Greenville, South Carolina By: /s/ R. Taylor Speer

> R. Taylor Speer | Attorney ID: 12267 email | tspeer@turnerpadget.com direct | 864-552-4618

J. Kenneth Carter | Attorney ID: 05108 email | kcarter@turnerpadget.com direct | 864-552-4611

Post Office Box 1509 Greenville, South Carolina 29602 facsimile | 864-282-5993

TPGL 10863264v1 16881.00101 Attorneys for Defendant MG Freesites, Ltd.

MITCHELL SILBERBERG & KNUPP LLP

Marc E. Mayer | admitted pro hac vice email | mem@msk.com direct | 310-312-3154

2049 Century Park East 18th Floor Los Angeles, California 90067 facsimile | 864-282-5993

Attorneys for Defendant MG Freesites, Ltd.